

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

JESSE JAMES PAGAN, LILYANN DAVILA,
and JACK COWAN, on behalf of themselves
and all others similarly situated,

Plaintiffs,

Case No. 3:22-cv-297

v.

FANEUIL, INC.

Defendant.

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, EXPENSE
REIMBURSEMENT, AND SERVICE AWARDS TO THE NAMED PLAINTIFFS**

Plaintiffs Jesse James Pagan, Lilyann Davila, and Jack Cowan, individually and on behalf of all others similarly situated, by and through their undersigned counsel, hereby move the Court, without opposition and pursuant to Federal Rule of Civil Procedure 23, for an entry of an order: approving requested attorneys' fees expense reimbursement in the amount of \$225,000.00 and approving Service Awards in the amount of \$2,000.00 for each Class Representative.

The grounds for this motion are that the proposed settlement is within the range of reasonableness to justify granting the requested attorneys' fees and expenses as well as Service Awards. This motion is based on this Motion, the Memorandum of Law in Support, the

accompanying declarations, the pleadings, and papers on file in this action, and such oral argument and documentary evidence as may be presented at the hearing on this motion.

Dated: December 13, 2022.

Respectfully Submitted,

By: /s/ Lee A. Floyd

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Counsel for Plaintiffs and the Settlement Class

CERTIFICATE OF SERVICE

I certify that I caused the foregoing to be electronically filed in this case on the 13th day of December, 2022 using the Court's CM/ECF System, thereby serving it upon all counsel of record in this case.

/s/ Lee A. Floyd
Lee A. Floyd